

ARCADIS GERAGHTY & MILLER



U.S. Environmental Protection Agency
77 West Jackson Boulevard, HSRW-6J
Chicago, Illinois 60604-3590

ORIGINAL PREVIOUSLY
TRANSMITTED BY
TELECOPIER

Attention: Mr. Brad Bradley and Ms. Sheri Bianchin

Subject:
Access for Monitoring Well Installations
Remedial Design For Groundwater
NL Industries/Taracorp Superfund Site
Granite City, Illinois
ARCADIS Geraghty & Miller Project No. C10001003.0008

ARCADIS Geraghty & Miller, Inc.
35 East Wacker Drive
Suite 1000
Chicago
Illinois 60601
Tel 312 263 6703
Fax 312 263 7897

ENVIRONMENTAL

Dear Mr. Bradley and Ms. Bianchin:

CHICAGO,
31 March 2000

In response to your request, we have prepared a comprehensive summary of the efforts that ARCADIS Geraghty & Miller and the NL Industries/Taracorp Superfund Site Group (the "Group") have taken to secure access to off-site properties for installation of monitoring wells associated with the remedial design for groundwater at the NL Industries/Taracorp site (the "Site"). As you know, the U.S. EPA provided conditional approval of the Pre-Design Investigation Work Plan for Groundwater on October 25, 1999. As part of its review, the Agency identified a number of additional off-site well locations. At that time, efforts were quickly initiated to identify property owners and contact persons and to prepare access agreements so that monitoring well installation could begin as soon as possible. However, securing access to the proposed well locations has proven to be a slow and extremely difficult process, due to the many entities that required contact and the many follow-up efforts that have been required.

Contact:
Jack L. Kratzmeyer

Extension:
312.425.4114

Our initial efforts to contact private property owners following preparation and issuance of the access agreements in early December 1999 were generally unsuccessful. As a contingency, we then decided to also pursue access agreements on a parallel track, to alternate well locations on public rights-of-way from the Madison County Highway Department, the City of Venice, the City of Granite City and the City of Madison. This process required additional effort and time to contact and negotiate with city attorneys, public works officials and the individual city councils, whose approval of the access agreements was required. Nevertheless, we ultimately were able to secure access agreements to the public rights-of-way for the majority of the well locations, while efforts to obtain access from the private property owners were still ongoing. However, we did not obtain access to the last public rights-of-way from the Madison County Highway Department until February 21, 2000.

The agency was briefed on the status of the Group's efforts to secure access agreements for the well installation during a conference call on February 10, 2000, as well as our plans to initiate field activities for the pre-design investigation at those properties for which access has been secured. ARCADIS Geraghty & Miller and its drilling subcontractor, Philip Environmental Services, Inc. mobilized to the Site on Monday, February 28, 2000 to initiate drilling activities for the new monitoring well installations. Installation of monitoring wells at those locations where access has been

EPA Region 5 Records Ctr.



257846

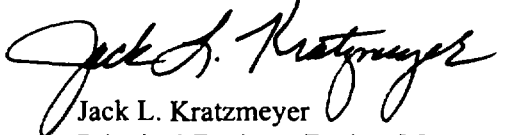
obtained was completed on Saturday, March 18, 2000. Collection of the first round of groundwater samples from the existing and newly installed monitoring wells at the Main Industrial Site and the Remote Fill Areas site began Monday, March 20, 2000, and was completed on Friday, March 24, 2000.

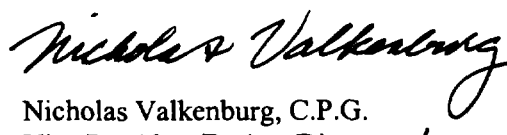

At this time, we still do not have access to the five monitoring well locations at the neighboring National Steel/Granite City Steel Company property. Granite City Steel company representatives anticipated our request, but initially deferred action pending review by legal advisors. Following Mr. Bradley's meeting with company representatives on March 3, 2000, we subsequently met with Mr. Carl Cannon of National Steel at the Granite City facility on March 8, 2000 to inspect the proposed locations. National Steel has requested that one of the proposed locations be relocated to adjacent railroad property. We have recently been in discussions with National Steel to find an acceptable alternate location for this monitoring well on National Steel company property, to eliminate the need to initiate discussions at this juncture with yet another entity (i.e., the railroad). Based upon discussions with Mr. Cannon on March 29, 2000, it appears that National Steel will not agree to an acceptable alternate location on its property and that installation of that well on railroad property will be required, if access can be obtained from the railroad. A revised access agreement was issued to Mr. Cannon on March 29, 2000, and he has agreed to seek management input regarding well installation.

A detailed chronology of the actions taken by ARCADIS Geraghty & Miller and the Group to secure access to the off-site monitoring well locations is enclosed. If you should have any questions regarding the enclosed information, please do not hesitate to contact either of the undersigned.

Sincerely,

ARCADIS Geraghty & Miller, Inc.


Jack L. Kratzmeyer
Principal Engineer/Project Manager


Nicholas Valkenburg, C.P.G.
Vice President/Project Director 

Enclosure(1): Summary of Access Activities

Copies:

Jeffrey Leed, Leed Environmental, Inc., w/enclosure

**Summary of Well Access Activities
Remedial Design for Groundwater
NL Industries/Taracorp Superfund Site
Granite City, Illinois**

<u>DATE</u>	<u>ACTIVITY</u>
Sept 7-99	Submission of Pre-Design Investigation Work Plan for Groundwater to EPA
Sept 20-99	The Group's project coordinator received EPA's draft comments on the proposed groundwater monitoring well locations at the industrial site, Eagle Park Acres, and Venice Township. The comments were provided to ARCADIS personnel for review and consideration. Project planning efforts were initiated to address EPA's draft comments, which included the identification of additional off-site well locations.
Oct 1-99	Conference call with EPA, ARCADIS, and the Group's Technical Committee to discuss EPA's September 20, 1999 draft comments regarding proposed monitoring well locations and the proposed approach for the pre-design field investigation for groundwater.
Oct 8-99	Representatives of EPA, ARCADIS, and the Group's Technical Committee met by conference call to continue discussions related to proposed monitoring well locations and the proposed scope of work for the pre-design field investigation for groundwater. Efforts were initiated to identify property owners and prepare access agreements to those properties for installation of groundwater monitoring wells.
Oct 25-99	The Group's project coordinator received EPA's approval of the Pre-Design Investigation Work Plan for Groundwater and EPA's comments.
Oct 29-99	The Group's project coordinator received from ENTACT, Inc. a copy of a standard access agreement being utilized in conjunction with remediation of residential soil and provided the access agreement to Group representatives for use in continuing efforts to finalize an access agreement for groundwater well installation and sampling activities.
Nov 5-99	The Group's project coordinator received a copy of an access agreement for the City of Venice from EPA for use in follow-up activities to obtain access to properties within Venice.

- Nov 9-99 ARCADIS personnel finalized and provided to Group members a listing of off-site well location information, individual tax information sheets for each parcel of property, etc. for the proposed off-site monitoring well installation locations.
- Nov 10-99 The Group's project coordinator received copies of access agreements that had been previously sent, but never executed by, Granite City Steel and Terminal Railroad Association of St. Louis.
- Nov 12-99 The Group's project coordinator received confirmation from EPA that it would be acceptable to use the names of EPA's remedial project managers as points of contact in access agreements should inquiries from property owners be received.
- Nov 15-99 Representatives of the Group met with ARCADIS personnel to discuss access, access agreements, and to develop a priority list for access to properties required for installation of monitoring wells.
- Nov 16-99 Finalization of proposed well drilling protocol developed by ARCADIS and provided to Group representatives for inclusion in access agreements.
- Nov 16-99 Additional efforts by Group representatives to identify property owners, points of contact, etc. for access purposes.
- Nov 17-99 Comments on draft access agreement for monitoring well installation provided by the Group's project coordinator to Group representatives for review and approval.
- Nov 23-99 Received finalized Consent for Access to Property form from Thompson Coburn LLP Group representatives
- Nov 23-99 Well drilling protocol provided to ARCADIS field personnel for use in preparation of cover letters for access agreements.
- Dec 6-99 Prepared draft "Monitoring Well Installation, Sampling and Abandonment Procedures" and "Fact Sheet" attachments to the "Consent for Access to Property" form.
- Dec 8-99 Conducted site reconnaissance to inspect each of the proposed off-site well locations. Obtained property tax maps from the Madison County assessor's office for each of the affected properties. Obtained Tax I.D. number from the property tax maps for each of the off-site

properties where wells were proposed. Cross-referenced name and address of current owner of each property from the Tax I.D. number and county assessor's records.

- Dec 13-99 Prepared individual exhibits for each access agreement showing the proposed location of the monitoring well on the tax map for the property.
- Dec 17-99 Mailed "Consent for Access to Property" form with attachments and exhibits to each of the private off-site property owners via certified mail.
- Jan 4-00 ARCADIS personnel received a Consent for Access to Property form from Martin & Bailey, Inc.
- Jan 4-00 ARCADIS received a signed copy of an access agreement from Mark Bayley, Martin & Bailey, Inc., for installation of monitoring well GMMW-123.
- Jan 7-00 Met with Mr. Glenn Hollis, a Granite City employee, to determine the process of obtaining a right-of-way permit for the installation of monitoring wells and to determine which off-site wells were located within the city limits. Requests must be presented to the City Council at regularly scheduled meetings. The next City Council meeting was scheduled for January 25, 2000.

Met with Mr. George Hlava, Building Inspector for the City of Madison, to determine the process of obtaining a right-of-way permit for the installation of monitoring wells, and to confirm which alternate off-site well locations were located in the City of Madison. Referred to the City Engineer (Joe Juneau of Juneau Associates, Inc.). Met with Joe Juneau to review locations.

Met with a clerk for the City of Venice. Referred to Casper Nighohossian, the City Attorney.

Met with Richard Bequette, an engineer for the Madison County Highway Department to determine the process of obtaining a right-of-way permit for the installation of monitoring wells and to confirm which of the alternate off-site well locations were located within the County's jurisdiction. Obtained copy of permit application and informed me that GMMW-120, GMMW-121, and GMMW-122 were located within the County's jurisdiction.

- Jan 10-00 Contacted Mr. Carl Cannon of National Steel Corporation by telephone. He confirmed that he had received the certified letter with the "Consent for Access to Property" form. He stated that legal and corporate would need to approve the request.
- Contacted Mr. Joe Juneau of Juneau Associates, Inc. by telephone. Mr. Juneau indicated that process of obtaining a right-of-way permit for the installation of monitoring wells would require a written request to the City Council. Advised that the next City of Madison council meeting was scheduled for January 11, 2000.
- Completed Madison County Highway Department permit applications for wells GMMW-120, GMMW-121, and GMMW-122.
- Drafted letter to the City Council of the City of Madison requesting approval to install Monitoring Well GMGMW-123 within the City's right-of-way.
- Jan 11-00 Contacted Mr. Casper Nighohossian's office and scheduled an appointment to meet with Mr. Nighohossian in the afternoon. During the meeting, Mr. Nighohossian explained that the request had to be made in writing and approved by the City Council. Monitoring wells GMMW-118 and GMMW-119 were located in the City of Venice. Mr. Nighohossian informed me that the next council meeting was January 25, 2000.
- Hand delivered permit applications to the Madison County Highway Department.
- Hand delivered request letter to the City of Madison.
- Jan 12-00 Contacted Mr. Juneau to verify that the request had been presented to the City of Madison city council. He indicated that it had, however, he did not attend the meeting and could provide no additional detail.
- Jan 13-00 ARCADIS personnel received a signed copy of an access agreement from Mr. Walter Shifrin for installation of a monitoring well at the Bissell Street Warehouse Company.

Jan 17-00 Contacted Mr. Juneau to determine the status of the request that was presented to the City of Madison city council on January 11, 2000. He indicated that a Certificate of Insurance with the City listed as an additional insured would be required.

Attempted to locate telephone numbers of property owners who had been sent "Consent for Access to Property" forms via certified mail, so that follow-up calls could be made to answer any questions, and determine if the agreements had been signed and returned.

Called: Madison IL & St. Louis Ry Co. - unable to locate a number.

Bissell Street Warehouse Co. - called and left a message for the manager.

Willie R. Foster - called and spoke with Mrs. Foster. She said that she would sign and return the form.

Eagle Park Acres Imp. Assn. - unable to locate a number.

Bobby L & Verillian Ervin - unable to locate a number.

Martin and Bailey, Inc. - called and left a voice mail for Mark Bailey. Received return call from his assistant confirming that informing me that the form had been signed and returned.

John Obucina - called no answer.

Illinois Central Railroad - called no answer.

Jan 18-00 Called: John Obucina - no answer.

Illinois Central Railroad - called three additional numbers - no answer.

Jan 19-00 Requested Certificate of Insurance from Marsh USA, Inc. listing the City of Madison as the Certificate Holder and issued to the attention of Mr. Joe Juneau.

Jan 20-00 Illinois Central Railroad - contacted the East St. Louis, Illinois office and given numbers to the Homewood, IL and Chicago, IL offices. Called and left voice mail message with Claire O'Neil. Returned call

and advised that Wayne Garner in Real Estate Department should be contacted. Called and left voice mail message for Mr. Garner.

Jan 24-00 Illinois Central Railroad - contacted Mr. Wayne Garner. He indicated that the tracks in questions had been sold to Union Pacific Railroad.

Left voice mail message for Mr. Bequette at the Madison County Highway Department regarding the status of the permit applications. He called back and indicated that he had been unable to contact one of the two township commissioners.

Drafted letter to the City of Venice requesting approval to install monitoring wells in the city's right-of-way.

Jan 25-00 ARCADIS personnel provided access agreements to Mayor Tyrone Echols, Venice City Council, to request access for installation of groundwater monitoring wells in the right-of-way on the south side of Kerr Street and in the right-of-way on the east side of Fourth Street.

Jan 26-00 Hand delivered request letters to Casper Nighohossian's office and to Venice City Hall to the attention of Mayor Tyrone Echols.

Called Mr. Hollis of Granite City to inquire about the City Council's approval to our request. He indicated that it had been approved and that the permit was available at his office. Picked up permit.

Contacted Mr. Juneau to inquire about the status of the Madison city council's approval of our request. He indicated that the request was approved and that Mr. George Hlava should be contacted regarding additional requirements. Met with George Hlava at his office. He indicate that an actual permit would not be issued , but that he would have to be notified prior to the installation. He also requested that the well location be surveyed following to installation.

Feb 8-00 Called Carl Cannon at National Steel Corporation - left voice mail message.

Feb 9-00 Called Mr. Cannon at National Steel Corporation - He indicated that he could not move forward with the request because he was unable to identify the locations of the proposed wells from the figure that had been attached to the "Consent for Access to Property" forms.

- Feb 10-00 Representatives of ARCADIS and the Group's Technical Committee conducted a conference call meeting with EPA's remedial project manager to discuss the Group's difficulties in securing access to off-site properties for installation of groundwater monitoring wells. Following the conference call meeting and in response to EPA's request, ARCADIS initiated efforts to prepare a letter to document the Group's efforts to secure access.
- Feb 17-00 Contacted Mr. Nighohossian to inquire about the status of the Venice city council's approval to our request. He indicated that the council would like a representative available to answer questions at the next meeting, which was scheduled for February 29, 2000.
- Feb 21-00 Received approved permits from the Madison County Highway Department.
- Feb 22-00 The Group's project coordinator spoke with EPA's project manager regarding the Group's continuing efforts to secure access for installation of groundwater monitoring wells.
- Feb 22-00 The Group's project coordinator provided an executed copy of the Consent for Access to Mr. Mark Bayley for installation and sampling of a groundwater monitoring well at the Martin & Bailey, Inc. facility.
- Feb 22-00 The Group's project coordinator provided an executed copy of the Consent for Access to Mr. Walter Shifrin for installation and sampling of a groundwater monitoring well at the Bissell Street Warehouse Company.
- Feb 23-00 The Group's project coordinator spoke with George Webb, Metalico, and Scott Oney, State Street Warehouse to confirm access arrangements for monitoring well installation and the tentative schedule of installation for monitoring wells on each property. The Group's project coordinator provided information to Mr. Oney to confirm the approximate location of proposed groundwater monitoring wells.
- Feb 24-00 The Group's project coordinator provided a letter to EPA's remedial project manager to reconfirm the Group's difficulties in efforts to secure access to off-site properties for groundwater monitoring well installation and sampling. The February 24, 2000 letter also confirmed that ARCADIS planned to mobilize to the site on

February 28, 2000 to initiate field activities associated with the pre-design investigation for groundwater at those properties for which access had been secured.

- Feb 28-00 ARCADIS Geraghty & Miller and its drilling contractor, Philip Environmental Services Corporation of Columbia, Illinois, mobilized to the site to initiate field activities associated with the pre-design investigation for groundwater, including redevelopment of existing monitoring wells and installation of groundwater monitoring wells in areas where access had been obtained.
- Feb 29-00 ARCADIS Geraghty & Miller made presentation regarding monitoring well access at the City Council meeting for the City of Venice. City council approved installation of monitoring wells in public rights-of-way.
- Mar 8-00 ARCADIS Geraghty & Miller met with Carl Cannon of National Steel Corporation at facility. Inspected each of the proposed monitoring well locations. Mr. Cannon requested that one of the well locations be relocated to adjacent railroad property.
- Mar 15-00 ARCADIS Geraghty & Miller called Carl Cannon of National Steel Corporation to discuss potential alternate locations on National Steel property for well requested to be relocated to railroad property. Left message.
- Mar 29-00 ARCADIS Geraghty & Miller discussed potential alternate locations for Monitoring Well GMMW-116 with Carl Cannon of National Steel Corporation. No acceptable alternate location on National Steel property could be identified.
- Mar 29-00 ARCADIS Geraghty & Miller issued revised "Consent for Access to Property" forms to Carl Cannon removing references to Monitoring Well GMMW-116.
- Mar 31-00 ARCADIS Geraghty & Miller issued "Consent for Access to Property" forms to Terminal Railroad Association of St. Louis requesting access for installation of proposed Monitoring Well GMMW-116.

Summary of Status of Access to Off-Site Well Locations

- GMMW - 113 Approval obtained from Granite City right-of-way permit
- GMMW - 114*** Waiting for approval from National Steel Corporation
- GMMW - 115*** Waiting for approval from National Steel Corporation
- GMMW - 116*** Waiting for approval from Terminal Railroad Association of St. Louis
- GMMW - 117 Approval obtained from Bissell Street Warehouse - signed access agreement
- GMMW - 118 Approval obtained from City of Venice City Council
- GMMW - 119 Approval obtained from City of Venice City Council
- GMMW - 120 Approval obtained from Madison County Highway Department right-of-way permit
- GMMW - 121 Approval obtained from Madison County Highway Department right-of-way permit
- GMMW - 122 Approval obtained from Madison County Highway Department right-of-way permit
- GMMW - 123 Approval obtained from Martin & Bailey, Inc. signed access agreement & City of Madison in right-of-way
- GMMW - 124*** Waiting for approval from National Steel Corporation
- GMMW - 125*** Waiting for approval from National Steel Corporation